Remarks

In the final Office Action dated August 16, 2010, it is noted that claims 1-4, 6-11, and 13-16 are currently pending; that claim 13 is objected to; that claims 1-3, 9, 13, and 15-16 stand rejected under 35 U.S.C. §102; and that claims 4, 6-8, 10-11, and 15 stand rejected under 35 U.S.C. §103.

By this amendment, claims 1 and 13 have been amended. The amendments to the claims are proper, justified and supported by the specification and claims, as originally filed. No new matter has been added.

Cited Art

The references cited and applied against the claims are listed as follows: U.S. Patent No. 6,690,657 to Lau (hereinafter Lau); U.S. Patent No. 6,915,338 to Hunt, et al. (hereinafter Hunt), U.S. Patent Publication Application No. US 2006/0179128 to Haulin, et al. (hereinafter Haulin; and U.S. Patent No 3,793,484 to Feezor (hereinafter Feezor).

Claim objections

Claim 13 stands objected to because of certain informalities. Claim 13 has been amended to recite "product intranet" as suggested in the Office action.

Rejection of claims 1-3, 9, 13, and 15-16 under 35 U.S.C. §102

Claims 1-3, 9, 13, and 15-16 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Hunt. Applicants respectfully traverse this rejection.

<u>With regard to claim 1:</u>

Claim 1 teaches a method for manufacturing an electronic product from a plurality of reusable electronic modules. Hunt as a whole does not show, teach, or reasonably suggest the claimed invention. Specifically, Hunt appears to teach a system to automatically enforce a policy in a multi-computer service application with a

modeling system and a deployment system. Hunt further explains that the modeling system permits developers <u>of applications for distributed computer systems</u> (e.g., server data centers, Internet data centers (IDCs), Web farms, and the like) to architect the hardware and software in an abstract manner. The modeling system defines a set of components used to describe <u>the functionality of an application</u> in a logical, scale-independent manner. *See Hunt at Col. 4, lines 26-34.*

It is respectfully submitted that the Office action misinterpreted the teaching of Hunt and misapplied them to claim 1. In particular, claim 1 recites: *"providing a product intranet blueprint describing modules required for the product."* The Office action merely points to an appearance of the term "physical blueprint" in Hunt as allegedly teaching the claimed invention. However, Hunt discloses a physical blueprint that defines which machines run which <u>pieces of software to form the application</u>. That is, the physical blueprint of Hunt intends to provide guidelines to form the application. This is in contrast to the intranet blueprint describing modules required for the electronic product, as recited in claim 1.

Further, the Office action merely points to a single appearance of the term "intranet" in Hunt's disclosure as allegedly showing the claimed feature: *"wherein the modules are operable to transmit and receive wireless messages according to a product intranet."* However, a review of col. 11 lines 25-30, reveals that Hunt intranet refers to communication of computer nodes in a distributed computer system.

> *"deployment system 700 includes a policy module 702, a core runtime logical-to-physical converter 704, and hardware/software resources 706 that are all interconnected via a wireless and/or wire-based communication network 708 (e.g., a LAN, a WAN, intranet, Internet, combinations thereof, etc.). In this example, the hardware/software resources are illustrated <u>as computer nodes of a distributed computer system</u>, as represented by computers 706(1), 706(2), . . . , 706(N). The policy module 702 and core runtime converter 704 may be implemented on one or more computers, which may or may not be part of the nodes <u>in the distributed computer system</u>." (emphasis added)*

In contrast, the claimed invention is directed at allowing <u>the modules within the electric product</u> to transmit and receive message using the <u>product intranet</u>.

The Office action also asserts that the claimed feature *"each module including description data describing capabilities of said modules, and wherein at least one module is a primary module operable to establish and co-ordinate said product intranet, and wherein at least one module is a primary module operable to establish and co-ordinate said product intranet"* is inherently disclosed by Hunt.

The Office action maintains that each computer inherently includes description data describing its capabilities. The Office action provides, as an example, a computer BIOS that contains such information. Applicants respectfully disagree. The BIOS contains program code to load and start an operating system and initializes devices of a personal computer. There is one BIOS in a computer system. A person skilled in art should appreciate that each device in the computer system does not contain BIOS. Thus, in contrast to the Office action's assertion, a BIOS cannot be read upon the claimed feature "each module including description data."

In addition, the Office action does not provide any evidence to support its assertion that it is inherent that <u>at least one module is operable to establish and coordinate the product intranet</u>. Applicants respectfully points to MPEP section 2112.IV, where it is stated that Examiner must provide a basis in fact and/or technical reasoning to reasonably support the determination that the allegedly inherent characteristic necessarily flows from the teachings of the applied prior art. Contrary to the Office action's assertion, as stated above, Hunt mentions "intranet" in the context of a distributed computer system. It is submitted that in such arrangements, computers are capable of working independently, i.e., without the control of a central device (primary module).

Claim 1 has been amended to recite: *"arranging the selected modules including said primary module in a product housing, <u>wherein the product housing is an integrated part of the manufactured reusable electronic product</u>;"*

Hunt teaches, in col. 1, lines 26-44, Internet data center (IDC), which is a specifically designed complex that houses many computers for hosting Internet-based

services. IDCs, which also go by the names "Webfarms" and "server farms," typically house hundreds to thousands of computers in climate-controlled, <u>physically secure buildings</u>. It would be readily apparent to a person skilled in the art that "physically secure buildings" are not and cannot be interpreted as the claimed housing which is an integrated part of the manufactured electronic product.

Therefore, it is respectfully submitted that Hunt does not teach or reasonably suggest at least the claimed features cited above. Thus, in light of these remarks, it is believed that claim 1 is not anticipated by Hunt. Hence, claim 1 and the claims dependent thereon are allowable under 35 U.S.C. §102. Withdrawal of this rejection is respectfully requested.

Claim 9:

Claim 9 recites, in part, *"electronic product comprising: a housing having a plurality of electronic modules each having radio unit for transmitting and receiving wireless messages according to a product intranet, and wherein at least one of the modules is a primary module having;"*

As discussed above, Hunt teaches, in col. 1, lines 26-44, Internet data center (IDC), which is a specifically designed complex that houses many computers for hosting Internet-based services. IDCs, which also go by the names "Webfarms" and "server farms," typically house hundreds to thousands of computers in climate-controlled, <u>physically secure buildings</u>. It would be readily apparent to a person skilled in the art that "physically secure buildings" are not and cannot be interpreted as the claimed housing which is an integrated part of the electronic product.

Therefore, it is respectfully submitted that Hunt does not teach or reasonably suggest at least the claimed features cited above. Thus, it is believed that claim 9 is not anticipated by Hunt. Hence, claim 9 and the claims dependent thereon are allowable under 35 U.S.C. §102. Withdrawal of this rejection is respectfully requested.

With regard to claim 13:

Claim 13 recites, in part, "*a radio unit for receiving a product intranet blueprint and*

for transmitting and receiving wireless messages from other electronic modules arranged in a product housing according to a product intranet" and *"microcontroller for establishing said product intranet in accordance with said blueprint."*

The Office action asserts that the radio unit is inherently disclosed by Hunt as underline wireless internet inherently includes a radio unit. However, the claimed invention calls for transmitting and receiving wireless messages using product intranet. A person skilled in the art would appreciate the differences between internet and intranet communication. Regardless, as stated above, the communication taught by Hunt is between computer nodes of a distributed computer system. In contrast, the claimed radio unit is directed at allowing the modules within the product housing to transmit and receive message using the product intranet.

Further, the Office action points to Hunt as teaching in col. 1, lines 26-44, a portion of the above-cited feature. Hunt appears to show an Internet data center (IDC), which is a specifically designed complex that houses many computers for hosting Internet-based services. IDCs typically house hundreds to thousands of computers in climate-controlled, physically secure buildings. As stated above, it would be readily apparent to a person skilled in the art that "physically secure buildings" are not and cannot be interpreted as the claimed housing, which is an integrated part of the electronic product.

Therefore, it is respectfully submitted that Hunt does not teach or reasonably suggest at least the claimed features cited above. Thus, it is believed that claim 13 is not anticipated by Hunt. Hence, claim 13 and the claims dependent thereon are allowable under 35 U.S.C. §102. Withdrawal of this rejection is respectfully requested.

Rejection of claims 4 and 8 under 35 U.S.C. §103(a)

Claims 4 and 8 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hunt in view of Haulin. The rejection is respectfully traversed.

Claims 4-8 depend from claim 1. Each dependent claim includes all the features of claim 1. Accordingly, Applicants essentially repeat the above arguments. As discussed at length in the response to a non-final Office action dated March 23, 2010, the added

reference Haulin does not bridge the feature gap pointed out above with respect to claim 1. In addition, Applicants respectfully submit that each dependent claim is allowable by virtue of its dependency from an allowable base claim, as well as the additional subject matter recited therein and not shown in the references. Withdrawal of this rejection is respectfully requested.

Rejection of claims 6-7, 10, and 14 under 35 U.S.C. §103

Claims 6-7, 10 and 14 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hunt in view of Lau. The rejection is respectfully traversed.

Claims 6-7 depend from claim 1, claim 10 depends from claim 9, and claim 14 depends from claim 13. Each dependent claim includes all the features of the respective base claim. Accordingly, Applicants essentially repeat the above arguments. The added reference Lau does not bridge the feature gap pointed out above with respect to claim 1. In addition, Applicants respectfully submit that each dependent claim is allowable by virtue of its dependency from an allowable base claim, as well as the additional subject matter recited therein and not shown in the references. Withdrawal of this rejection is respectfully requested.

Rejection of claim 11 under 35 U.S.C. §103(a)

Claim 11 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hunt in view of Lau, and in further view of Feezor. The rejection is respectfully traversed.

Claim 11 depends from claim 9 and includes all the features of base claim 9. Accordingly, Applicants essentially repeat the above arguments. The added references Lau and Feezor do not bridge the feature gap pointed out above with respect to claim 9. In addition, Applicants respectfully submit that each dependent claim is allowable by virtue of its dependency from an allowable base claim, as well as the additional subject matter recited therein and not shown in the references. Withdrawal of this rejection is respectfully requested.

Conclusion

In view of the foregoing, it is respectfully submitted that all the claims pending in this patent application are in condition for allowance. Reconsideration and allowance of all the claims are respectfully solicited.

In the event there are any errors with respect to the fees for this response or any other papers related to this response, the Director is hereby given permission to charge any shortages and credit any overcharges of any fees required for this submission to Deposit Account No. 14-1270.

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